

Wyoming Commercial Oilfield Waste Disposal Facilities
OGEA(T)/POPs RCRA Program Site Visits
Trip Report for May 26-29, 2015

As part of an ongoing effort between U.S. EPA Region 8, U.S. FWS Region 6 and various other federal and state governmental entities (e.g., BLM, state oil and gas commissions) the Oil and Gas Environmental Assessment Team (OGEA(T))/Problem Oil Pits (POPs) team initiative was undertaken in the mid-1990s in the states of Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. Multi-agency OGEA(T)/POPs inspections were primarily conducted in Wyoming in the summer of 1997. Based upon the findings, initial and numerous follow-up inspections have been conducted by representatives of U.S. EPA, U.S. FWS, BLM the Wyoming Department of Environmental Quality (WDEQ) and the Wyoming Oil and Gas Conservation Commission (WOGCC) since that initial summer.

From an OGEA(T)/POPs standpoint, the U.S. EPA RCRA program, although authorized to the states, retains primacy for RCRA 7003 – Imminent and Substantial Endangerment. The U.S. EPA and the U.S. FWS have primacy in regard to the OPA/SPCC program and the Migratory Bird Treaty Act (MBTA) respectively.

In light of the aforementioned background information provided above, the following constitutes a brief summary of RCRA program related environmental findings at each Wyoming commercial oilfield waste disposal facility (COWDF) visited on May 26-29, 2015. Participants included Randy Lamdin (USEPA), Kim Dickerson (USFWS), Dennis Lamb (WDEQ) and Rich Cripe (WDEQ).

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Grasslands COWDF (WYR000215053)

- Date: May 29, 2015
- Time in: 1221, Time out: 1250
- Location: Converse County, WY N of Bill, WY
- GPS Location: 43° 15' 05.97" N / 105° 16' 21.20" W
- Participants: Randy Lamdin (USEPA), Kim Dickerson (USFWS), Dennis Lamb (WDEQ), Rich Cripe (WDEQ), Jerry Hamil (Grasslands) and Todd Krushaus (Grasslands).
- A RCRA/MBTA inspection was conducted as a follow-up to a previous OGEA/POPs inspection conducted on July 29, 2014.
- USEPA/USFWS/WDEQ inspectors observed facility signage, four (4) large evaporation ponds, a netted skim/slop pit, two (2) tank batteries and a vacuum truck offloading area.
- The four (4), large evaporation ponds were free of any crude oil/crude oil emulsion on their surfaces. Freeboard (2' minimum) was adequate on all evaporation ponds.
- The netted skim/slop pit's netting was in good condition, with no holes/tears or sagging. The WDEQ inspector and facility representatives informed the USEPA/USFWS inspectors that a leak in the skim/slop pit's liner was being repaired. Under the circumstance of repair work being facilitated, freeboard (2' minimum) was adequate.

- Both of the tank batteries had adequate secondary containment and there was no pooled/standing crude oil within their confines.
- There was no pooled/standing crude oil in the vacuum truck offloading area.
- No photograph(s) of the Grasslands COWDF was/were taken.
- No mortality(ies) of wildlife/migratory bird(s) in particular was/were found by inspectors at the facility.
- No environmental area(s) of concern was/were noted by the inspectors during this RCRA/MBTA inspection.
- The USEPA/USFWS/WDEQ inspectors departed the Grasslands COWDF at approximately 1250.

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(b) (6)

signed by Randy Lamdin

Inspector Signature

Date

7/29/15

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)

1595 Wynkoop Street, Denver, CO 80202

NOTICE OF INSPECTION

<input checked="" type="checkbox"/> Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended. <input type="checkbox"/> Toxic Substance Control Act (TSCA) Public Law 94-469, as amended. <input type="checkbox"/> Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended.				
Date 5/29/15	Inspector # F17660	Daily Seq. 4 OF 6	Hour In: 1221 Out: 1250	Facility name WYR000215053
Fac. Func. _____	Invest. Type _____	Reason _____	RCRA: Gen () Transp. () OGEA TSD () POPS	GRASSLANDS COWDF
Facility Representative(s) ERNEST KAUFMAN				Street
Title				43°15'05.97"N / -105°16'21.20"W
Phone #		City N OF BILL		State WY Zip _____
Reason for Inspection: Entry by Consent: YES Warrant: () <input checked="" type="checkbox"/> To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs. <input type="checkbox"/> Other (Specify) _____ Violations of above referenced law are suspected from information or complaint. Yes () No <input checked="" type="checkbox"/>				
Samples, Documents, and /or Photos collected (describe below)				Medium
1. PHOTOGRAPH(S) - 0				Date to Lab
2.				
3.				
4.				
5.				
6.				
Samples requested and received by facility: (→) Yes (←) No If yes: (→) Duplicate. (←) Split. (→) Photos (To be received when processed.)				
This inspection has revealed the following probably violations of EPA laws or regulations. (RCRA 7003) NO ENVIRONMENTAL AREA(S) OF CONCERN WAS/WERE NOTED DURING THIS RCRA (USEPA) / MBTA (USFWS) / WDEQ - WQD INSPECTION.				
The facts established by this inspection will be reviewed by personnel in the EPA Regional Office. A final determination of your facility's compliance with EPA regulations will be made as a result of this review. The review may reveal additional violations.				
Receipt of the Notice of Inspection is acknowledged. JERRY HAMIL (PRESENT) TODD KRUSHAUS (PRESENT) _____ Signature of facility representative		<div style="background-color: black; color: red; padding: 2px; display: inline-block;">(b) (6) signed by Randy Lamdin</div> (USEPA) Signature of Lead Inspector KIM DICKERSON (USFWS) _____ Assisting Inspectors (EPA/Tribe/State) DENNIS LAMB (WDEQ) _____		